

COURTNEY M. PRICE  
VICE PRESIDENT  
CHEMSTAR

  
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201-14979

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OPPT NCIC

December 29, 2003

**Via Messenger and CD-Rom**

Michael O. Leavitt, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

**Re: Fatty Nitrogen Derivatives Panel Nitriles Task Group, Consortium No.  
HPV Chemical Challenge Program Submission of Ether Nitriles Category  
Justification and Testing Rationale**

Dear Administrator Leavitt:

The Fatty Nitrogen Derivatives Panel Nitriles Task Group of the American Chemistry Council submits the subject documents to EPA's HPV Chemical Challenge Program as its test plan for a category covering 3 chemicals. The Nitriles Task Group includes the following member company that is sponsoring these chemicals under the Voluntary HPV Chemical Challenge Program: Tomah3 Products, Inc.

This submission includes the following documents:

- Fatty Nitrogen Derived Ether Nitriles Category High Production Volume (HPV) Chemicals Challenge Assessment of Data Availability and Test Plan
- Appendix A: Robust Summaries for Reliable Studies and SAR Model Data.

Due to the size of the files, this submission is also being sent via CD-Rom to the above address. An email will be sent to the following email addresses to notify EPA of the submission:

Oppt.ncic@epa.gov  
Chem.rtk@epa.gov



Responsible Care®

Michael O. Leavitt  
Ether Nitriles Category HPV Chemical Challenge Program  
December 29, 2003  
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If you require additional information, please contact F. J. "Sonny" Maher, Fatty Nitrogen Derivatives Panel Manager at (703) 741-5605 or [sonny\\_maher@americanchemistry.com](mailto:sonny_maher@americanchemistry.com).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

Attachment  
cc: Nitriles Task Group  
Steve Russell, ACC  
Jim Keith, ACC